

## EXECUTIVE SUMMARY

Meritor Heavy Vehicle Braking Systems (USA), Inc., an existing Title V major source, submitted a permit renewal application and application was completed on July 23, 2004. The source elected to take a 70,000 tpy operation limit on iron processed in order to preclude major source status for HAPs, and is therefore Conditional Major with respect to HAPs. With this operation limitation the source is exempt from 40 CFR 63 Subpart M and E. The source also elected to have a combined paint booth VOCs emission limit of 103 tpy to preclude the applicability of 401 KAR 51:017, Prevention of Significant Deterioration (PSD), and is therefore Synthetic Minor with respect to VOCs.

The issuance of a Title V (for criteria pollutants)/ Conditional Major (HAPs) /Synthetic Minor (VOCs) requires a preliminary determination and public notice. The Division has done this. An advertisement was placed in the Carrollton News Democrat in Carrollton on October 11, 2006. The comment period ended on November 11, 2006. There were only comments received from Meritor Heavy Vehicle Braking Systems (USA), Inc. on November 3, 2006. Division of Air Quality had responded the comments individually, which have been detailed in "Response to Comments" in Statement of Basis. Minor changes were made to the permit as a result of the comments received, however, in no case were any emissions standards, or any monitoring, recordkeeping or reporting requirements relaxed.

In conclusion, a thorough analysis has been made of all relevant information available which pertains to this application. The Division has concluded that the proposed operation will comply with all air quality regulations and requirements. EPA has been notified of this proposed permit. This proposed permit has become final since no comments were received from the U.S. EPA during the 45-day comment period that ended on December 31, 2006.